

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:16CR-258 CEJ (NAB)
	)	
ALDEN DICKERMAN,	)	
	)	
Defendant.	)	

**GOVERNMENT’S SECOND MOTION FOR SEALING**

COMES NOW the United States of America, by and through Carrie Costantin, Acting United States Attorney for the Eastern District of Missouri, and Colleen C. Lang, Assistant United States Attorney for said District, and hereby moves this Court to allow the Government to file Exhibit One to their responses to the defendant’s Pre-Trial Motions under seal.

Exhibit One to both responses is an article (hereafter “the article”). This article is related to an ongoing investigation of child pornography offenses on “Freenet<sup>1</sup>” and how the law enforcement are investigating users of Freenet that are requesting child pornography on the network. The Government included the article as an exhibit because the article gives an accurate and complete picture of how Freenet works. The investigation techniques discussed in the article are still being used on “Freenet” by law enforcement to detect Freenet users that are requesting files of child pornography. The dissemination of law enforcement sensitive materials, including this article, could seriously jeopardize those continuing investigations.

Therefore, the Government moves to seal Exhibit One to their response due to it containing law enforcement sensitive material. The sealing request only applies to Exhibit One

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<sup>1</sup> “Freenet” is an online peer-to-peer file sharing network.

of their responses to pre-trial motions. The government's written response and other two exhibits, Exhibits Two and Three, can be made available to the public.

Respectfully submitted,

CARRIE CONSTANTIN  
Acting United States Attorney

/s/ Colleen C. Lang  
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Assistant United States Attorney  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 13, 2017, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Colleen C. Lang  
COLLEEN C. LANG, 356872MO  
Assistant United States Attorney